

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' FORTIETH (SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN DUPLICATE  
PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the fortieth omnibus objection (the "Objection")<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors"), for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the Duplicate Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Duplicate Claim set forth in Schedule 1 and Schedule 2 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 and Schedule 2 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Duplicate Claims referenced or identified in the Objection that is not listed on Schedule 1 and Schedule 2 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover are preserved.

5. To the extent a response is filed regarding any Duplicate Claim, each such Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

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The Honorable John T. Dorsey  
United States Bankruptcy Judge

**SCHEDULE 1**

**Duplicate Portal Claims**

FTX Trading Ltd. 22-11068 (JTD)  
Fortieth Omnibus Claims Objection  
Schedule 1 - Substantive Duplicate Claims

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
87948	Name on file	FTX Trading Ltd.	1INCH-PERP	0.0000000000000000	29102	Name on file	FTX Trading Ltd.	ETH	1.0008725900000000
			AAVE-PERP	0.0000000000000000				FTM	8,363.5435282100000000
			ADA-PERP	0.0000000000000000				FTT	163.5673268400000000
			APE-PERP	0.0000000000000000				LDO	104,344.5717200000000000
			AVAX-PERP	0.0000000000000000				TRX	3,525.3663160000000000
			BTC	0.000011094285710				USD	4,002,848.1800000000000000
			BTC-PERP	0.0000000000000000				USDT	0.0100000000000000
			CEL-0930	0.0000000000000000					
			DOGE-PERP	0.0000000000000000					
			DOT-20211231	0.0000000000000000					
			ENS-PERP	0.0000000000000000					
			ETH	1.000872598636328					
			ETH-0930	-0.0000000000000003					
			ETH-PERP	0.0000000000000056					
			ETHW	0.000296013636328					
			FIDA	9.5530859400000000					
			FIDA_LOCKED	21.9836110500000000					
			FTM	0.0000000000000000					
			FTT	163.567326844391800					
			GMT-PERP	0.0000000000000000					
			HT	0.0136652000000000					
			KSM-PERP	-0.0000000000000227					
			LDO	104,344.5717200000000000					
			LDO-PERP	0.0000000000000000					
			LUNA2	0.002663278895000					
			LUNA2_LOCKED	0.006214317422000					
			LUNC-PERP	-0.000000000094587					
			MKR-PERP	0.0000000000000000					
			PEOPLE-PERP	0.0000000000000000					
			SOL-PERP	0.0000000000000000					
			SRM	26.3700287900000000					
			SRM_LOCKED	104.4874680100000000					
			STETH	0.008189229333333					
			TRX	3,525.3663160000000000					
			TRX-0930	0.0000000000000000					
			TRX-PERP	0.0000000000000000					
			USD	4,002,848.175953700700000					
			USDT	0.006016104061450					
			USDT-PERP	0.0000000000000000					
			USTC-PERP	0.0000000000000000					
			WAVES-PERP	0.0000000000000000					
			XMR-PERP	0.0000000000000000					
			XRP-PERP	0.0000000000000000					
			YFII-PERP	0.0000000000000000					

Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.

80013	Name on file	FTX Trading Ltd.	Undetermined*	42368**	Name on file	FTX Trading Ltd.	BTC	0.0000048880000000
							ETH	0.0007945500000000
							ETHW	0.0007945500000000
							FTT	0.0929800000000000
							SHIB	32,477.0000000000000000
							SRM	20.3855874600000000
							SRM_LOCKED	17,043.6144125400000000
							TRX	0.0000010000000000
							USD	12,151,757.5762415510000000
							USDT	0.009604046567916

Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.

53539	Name on file	FTX Trading Ltd.	BTC	0.0000027200000000	36428***	Name on file	FTX Trading Ltd.	BTC	0.0000027200000000
			USD	103,813.0000000000000000				USD	103,813.6300000000000000
			USDT	0.0040587000000000				USDT	0.0040587000000000

Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.

58860	Name on file	FTX Trading Ltd.		23791	Name on file	FTX Trading Ltd.	
		1INCH-PERP	0.0000000000000000			1INCH-PERP	0.0000000000000000
		AAVE-PERP	0.0000000000000000			AAVE-PERP	0.0000000000000000
		ALPHA-PERP	0.0000000000000000			ALPHA-PERP	0.0000000000000000
		BAL-PERP	0.0000000000000000			BAL-PERP	0.0000000000000000
		BCH	0.075382681486297			BCH	0.075382681486297
		BTC	0.5856436800000000			BTC	0.504601184552852

\*Indicates claim contains unliquidated and/or undetermined amounts

\*\*Surviving Claim included as the claim to be modified subject to the Debtors' Thirty-Second (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)

\*\*\*Surviving Claim is also included as a Surviving Claim in the Debtors' Forty-First (Non-Substantive) Omnibus Objection to Certain Superseded Proofs of Claim (Customer Claims)

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
			BTC-PERP	0.000000000000000				BTC-PERP	0.000000000000000
			COMP-PERP	0.000000000000000				COMP-PERP	0.000000000000000
			DYDX-PERP	0.000000000000000				DYDX-PERP	0.000000000000000
			ENS-PERP	0.000000000000000				ENS-PERP	0.000000000000000
			ETH	1.001316660452561				ETH	1.001316660452561
			ETH-PERP	0.000000000000000				ETH-PERP	0.000000000000000
			ETHW	15.383000006150000				ETHW	15.383000006150000
			FTM-PERP	0.000000000000000				FTM-PERP	0.000000000000000
			FTT	500.497584310000000				FTT	500.497584310000000
			FTT-PERP	0.000000000000000				FTT-PERP	0.000000000000000
			GMT-PERP	0.000000000000000				GMT-PERP	0.000000000000000
			LINK	2.067424771059683				LINK	2.067424771059683
			LTC	0.081314103179363				LTC	0.081314103179363
			LTC-PERP	0.000000000000000				LTC-PERP	0.000000000000000
			MKR-PERP	0.000000000000000				MKR-PERP	0.000000000000000
			OP-PERP	0.000000000000000				OP-PERP	0.000000000000000
			ROOK	0.000239600000000				ROOK	0.000239600000000
			RUNE	1,156.864805150467400				RUNE	1,156.864805150467400
			SOL	0.068576963291897				SOL	0.068576963291897
			SRM	11.667392510000000				SRM	11.667392510000000
			SRM_LOCKED	123.858444230000000				SRM_LOCKED	123.858444230000000
			SRM-PERP	0.000000000000000				SRM-PERP	0.000000000000000
			SUSHI-PERP	0.000000000000000				SUSHI-PERP	0.000000000000000
			TRX	0.000010000000000				TRX	0.000010000000000
			UNI	3.486149896087093				UNI	3.486149896087093
			UNI-PERP	0.000000000000000				UNI-PERP	0.000000000000000
			USD	173,677.827765799040000				USD	173,677.827765799040000
			USDT	0.000000001459870				USDT	0.000000001459870
			XRP	0.531920149292489				XRP	0.531920149292489
			XRP-PERP	0.000000000000000				XRP-PERP	0.000000000000000
			YFI	0.000000009525610				YFI	0.000000009525610
			YFI-PERP	0.000000000000000				YFI-PERP	0.000000000000000

Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.

**SCHEDULE 2**

**Duplicate Non-Portal Claims**

Duplicate Substantive  
Schedule 2

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT		CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
1	Name on File Address on File	09/18/23	22-11068 (JTD) FTX Trading Ltd.	80020	Undetermined*		Name on File Address on File	12/04/23	22-11068 (JTD) FTX Trading Ltd.	89406	\$12,304,500.00*
Reason: Claim to be disallowed is substantively duplicative of claim 89406											
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)											
2	Name on File Address on File	03/20/23	22-11068 (JTD) FTX Trading Ltd.	1305	\$600,000.00		Name on File Address on File	06/09/23	22-11068 (JTD) FTX Trading Ltd.	2072	\$300,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 2072											
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)											
3	Name on File Address on File	03/27/23	22-11068 (JTD) FTX Trading Ltd.	1388	\$321,049.72*		Name on File Address on File	03/27/23	22-11068 (JTD) FTX Trading Ltd.	1350	\$10,764,441.36*
Transferred to: DCP Master Investments XIV LLC as Transferee of Name on File Address on File						Transferred to: DCP Master Investments XIV LLC as Transferee of Name on File Address on File					
Reason: Claim to be disallowed is substantively duplicative of claim 1350											
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)											

\*Indicates claim contains unliquidated and/or undetermined amounts

Duplicate Substantive  
Schedule 2

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
4	Name on File Address on File	03/27/23	22-11068 (JTD) FTX Trading Ltd.	1372	\$604,551.04*	Name on File Address on File	03/27/23	22-11068 (JTD) FTX Trading Ltd.	1350	\$10,764,441.36*
	Transferred to: DCP Master Investments XIV LLC as Transferee of Name on File Address on File					Transferred to: DCP Master Investments XIV LLC as Transferee of Name on File Address on File				
Reason: Claim to be disallowed is substantively duplicative of claim 1350										
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)										
5	Name on File Address on File	06/29/23	22-11068 (JTD) FTX Trading Ltd.	3732	Undetermined*	Name on File Address on File	05/16/23	22-11068 (JTD) FTX Trading Ltd.	1915	\$750,000.00*
Reason: Claim to be disallowed is substantively duplicative of claim 1915										
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)										
6	Name on File Address on File	05/29/23	22-11068 (JTD) FTX Trading Ltd.	2304	Undetermined*	Name on File Address on File	04/17/23	22-11068 (JTD) FTX Trading Ltd.	1646	\$614,417.81
Reason: Claim to be disallowed is substantively duplicative of claim 1646										
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)										

\*Indicates claim contains unliquidated and/or undetermined amounts

Duplicate Substantive  
Schedule 2

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
7	Name on File Address on File	05/15/23	22-11068 (JTD) FTX Trading Ltd.	1914	\$12,314,145.52	Name on File Address on File	05/18/23	22-11068 (JTD) FTX Trading Ltd.	1939	\$13,387,129.39
	Transferred to: Svalbard Holdings Limited as Transferee of Name on File Address on File					Transferred to: Svalbard Holdings Limited as Transferee of Name on File Address on File				
	Reason: Claim to be disallowed is substantively duplicative of claim 1939									
	Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)									
8	Name on File Address on File	03/06/23	22-11165 (JTD) FTX Crypto Services Ltd.	1094	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
	Reason: Claim to be disallowed is substantively duplicative of claim 1091									
	Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)									
9	Name on File Address on File	03/06/23	22-11066 (JTD) Alameda Research LLC	1102	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
	Reason: Claim to be disallowed is substantively duplicative of claim 1091									
	Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)									
10	Name on File Address on File	03/06/23	22-11069 (JTD) Alameda Research Holdings Inc.	1104	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
	Reason: Claim to be disallowed is substantively duplicative of claim 1091									
	Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)									

Duplicate Substantive  
Schedule 2

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
11 Name on File Address on File	03/06/23	22-11116 (JTD) FTX (Gibraltar) Ltd	1105	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 1091					Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)				
12 Name on File Address on File	03/06/23	22-11134 (JTD) Alameda Global Services Ltd.	1107	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 1091					Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)				
13 Name on File Address on File	03/06/23	22-11171 (JTD) FTX US Services, Inc.	1109	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 1091					Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)				
14 Name on File Address on File	03/06/23	22-11105 (JTD) Alameda Research (Bahamas) Ltd	1112	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 1091					Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)				
15 Name on File Address on File	03/06/23	22-11076 (JTD) FTX Property Holdings Ltd	1122	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 1091					Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)				

Duplicate Substantive  
Schedule 2

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT	CLAIMANT	DATE FILED	DEBTOR	CLAIM #	CLAIM AMOUNT
16	Name on File Address on File	03/06/23	22-11067 (JTD) Alameda Research Ltd	1124	\$500,000.00	Name on File Address on File	03/06/23	22-11101 (JTD) FTX Hong Kong Ltd	1091	\$500,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 1091										
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)										
17	Name on File Address on File	03/20/23	22-11068 (JTD) FTX Trading Ltd.	1282	\$600,000.00	Name on File Address on File	03/20/23	22-11068 (JTD) FTX Trading Ltd.	1286	\$2,400,000.00
Reason: Claim to be disallowed is substantively duplicative of claim 1286										
Surviving Claim is pending modification on the Debtors' Twenty-Eighth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)										